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January 16, 2014

Deirdre Boelke, Sea Scallop Plan Coordinator  
New England Fishery Management Council  
50 Water Street  
Newburyport, MA 01950

Dear Deirdre and members of the Scallop Advisory Panel and Scallop Committee:

At next week's meetings you will make a recommendation concerning the NGOM TAC for the next two fishing years. I would like to remind you that a management loophole currently enables LA vessels to take an unlimited amount of scallops from the NGOM, regardless of what TAC is ultimately chosen.

The NGOM TAC should be set at a level that prevents overharvest of the NGOM resource, and all vessels fishing in the area should have their scallop landings applied to it. This resource has always fluctuated between extreme highs and lows. If it is protected from overfishing, the next high could sustain a great deal of small to mid sized boats in Maine, New Hampshire and Massachusetts. We have learned a lot in the roughly 20 years since the NGOM last "bloomed". With proper management, we may very well be able to prevent a "bust" and this area could produce consistent landings.

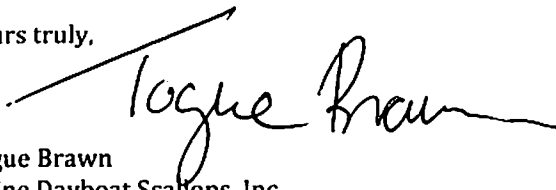
It seems rather futile to debate whether or not the NGOM TAC should be reduced by 12,000 pounds while simultaneously refusing to address the much larger issue: LA vessels can currently remove tens of thousands or even hundreds of thousands of pounds from the area.

The NGOM resource appears to be rebounding. Recent landings are clear evidence of that. The Council is debating reopening areas in the NGOM that could entice to LA vessels to the area. It is absolutely irresponsible to continue to postpone correction of the management loophole that allows LA vessels to fish in the NGOM without abiding by measures designed to protect the fishery and the resource in the area. Fisheries resources cannot be retroactively protected. This loophole must be closed.

The NEFMC is supposed to protect New England fisheries. This includes both fishermen and resources. The NGOM was established so that small to mid sized vessels could maintain access to the NGOM scallop resource. There is only one way to do this: all vessels fishing in the NGOM must be bound by the 200 pound possession limit and the 10' dredge size, and all scallops from the area must be applied to the NGOM TAC.

I request that the Council close this loophole as soon as possible. Thank you for your consideration.

Yours truly,

A handwritten signature in black ink that reads "Togue Brawn". The signature is written in a cursive style with a long horizontal line extending to the right.

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